

1 MR. STEVENSON: He did answer.

2 A. No.

3 BY MR. FELSON:

4 Q. The answer was no. Okay. Did anybody
5 ever mention the issue -- besides this lawsuit, I
6 understand you know what's in the lawsuit.

7 Besides the lawsuit, did anybody ever
8 mention what we do if there's something that looks
9 like it's not trash? Anybody ever ask you?

10 A. Well, I've received -- we find all manner
11 of stuff along the highway. I've received calls when
12 they find guns. What -- we found a gun, what do we
13 do? Call the cops. We found stuff that looks to be
14 like a bag full of money, what do we do? Call the
15 cops. We found a dead body, what do we do? Call the
16 cops.

17 Q. You don't put the money in the trash --

18 A. No.

19 Q. -- and then compact it?

20 A. No. We call the cops.

21 Q. Ever been requested by attorneys from the
22 prosecutor's office to just bring it over here?

23 A. No.

24 MR. STEVENSON: I assume that's a joke.

25 MR. FELSON: It could happen, it could

1 happen. In New York City, it would happen.

2 A. Yeah. They find wallets, they find all --
3 there's a cornucopia of stuff. And I would get calls
4 that we have found this, what do we do with it? Now,
5 as far as segregating --

6 Q. Well, let me stop you a second. You would
7 get calls, and that would be from?

8 A. The crew chiefs.

9 Q. Crew chiefs. So they wouldn't know what
10 to do with that without calling you each time?

11 A. Sometimes they do, sometimes they don't.
12 Newer employees tend to be somewhat more cautious.
13 Older guys, no.

14 Q. So I take it then from that, I'm
15 inferring, tell me if I'm right, written instructions
16 as to what to do with personal property when you find
17 it -- well, when your probationers find it, those
18 didn't exist, correct?

19 A. Would you restate the question?

20 Q. Okay. I'm implying, and I want you to
21 confirm this or reject it, from the fact that people
22 call you and ask you what to do with a wallet or with
23 money --

24 A. Uh-huh.

25 Q. -- that they didn't have a memorandum or a

1 manual or some written instructions saying what to do
2 with personal property?

3 A. No. The instruction is that if you don't
4 know, ask.

5 Q. Okay.

6 A. If you have a question, ask.

7 Q. Now, when you say the instruction, that's
8 a general, oral instruction?

9 A. Yes.

10 Q. There wasn't much in the way of written
11 instructions to these crew chiefs, correct?

12 A. That's correct.

13 Q. In fact, so far I haven't heard of any
14 written instruction to crew chiefs?

15 A. That's correct.

16 Q. All right. Now, besides this case, have
17 you ever talked with -- have you ever had a
18 discussion with anybody concerning cleanups under
19 bridges, specifically under bridges where homeless
20 people might sleep?

21 I understand you had conversations here
22 with Jeff Smith, but --

23 A. Beyond the scope of this case, no.

24 Q. So besides Jeff Smith who you had a talk
25 with about the cleanup that's possibly what we're

1 talking about here, you don't recall any other just
2 even casual conversations?

3 A. No. Again, the instructions were, you
4 don't touch it.

5 Q. The instructions from your time on --

6 A. Uh-huh.

7 Q. -- is don't do it?

8 A. Right.

9 Q. But you know it's also possible that -- I
10 mean, if you're in a long term -- some of these
11 people have been around for a long time, they might
12 have talked about anything.

13 You don't recall anybody saying, gee, one
14 time we went out, and these guys were sleeping there
15 and they had a small gold bullion?

16 A. I have not had any conversation like that.

17 MR. FELSON: And the prosecutor said,
18 bring it over, okay. Okay.

19 BY MR. FELSON:

20 Q. And this is really a -- it's similar to
21 the last question, but it's slightly more detailed.

22 Have you ever heard of personal property
23 from homeless sites being taken to the police
24 property room of any kind?

25 A. No.